

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:
	:
Orly Genger,	:
	:
	:
Debtor.	:
-----X	

Chapter 7
Case No. 19-13895 (JLG)

**DEBTOR’S RESPONSE TO SAGI GENDER’S
PRE-TRIAL MOTION TO UNSEAL DOCUMENTS**

Chapter 7 Debtor Orly Genger hereby responds to the motion filed by movant Sagi Genger entitled, “Sagi Genger’s Pre-Trial Motion to Unseal Documents,” dated June 1, 2021 (Doc. 428).

RESPONSE

With just one exception, Debtor does not oppose unsealing the documents identified by movant for purposes of the trial scheduled for June 16-18, 2021.

The exception is Debtor’s prenuptial agreement. In prior judicial proceedings, and in recognition of the highly personal nature of the agreement, the federal court ordered disclosure of only certain provisions of that document (sections 20(a), 33, 34(b) and Exhibit A), which were produced in unredacted form in an otherwise redacted document. To minimize intrusion on Debtor’s private marital relationship and in light of the agreement’s dubious relevance (to say the least) to any issue to be tried, Debtor requests that the Court disallow any reading of these provisions in open court during trial. Any argument movant desires to make (and any counterargument) can be made with reference to the sealed provisions, which unredacted

provisions have been submitted to the Court under seal as Exhibit EE to the pending motion to dismiss.

Debtor proposed a stipulation to this effect and discussed the matter with movant's counsel, who took it under advisement. As of the submission of this Response, the undersigned has not heard from counsel whether this limitation is acceptable to movant.

CONCLUSION

For the foregoing reasons, Debtor does not oppose movant's pre-trial unsealing motion with respect to the "confidential" documents delineated above and Debtor opposes any reading in open court of any of the provisions of Debtor's prenuptial agreement.

Dated: New York, New York
June 7, 2021

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CERTIFICATION OF SERVICE

I hereby certify that a true and correct copy of this response to the specified pre-trial motion has been served upon each attorney of record by ECF and filed with the Court on this 7th day of June 2021.

/s Michael Paul Bowen